



CALIFORNIA BUILDING CODE (2006 IBC) PUBLIC PROPOSAL FORM

PLEASE SEE REVERSE FOR INSTRUCTIONS ON SUBMITTING PUBLIC PROPOSALS. PROPOSALS MUST COMPLY WITH THESE INSTRUCTIONS.

- 1) Indicate the format in which you would like to receive your Public Proposals Monograph (PPM), Report of the Hearing (ROH) and Final Action Agenda (FAA):

☒ Paper ☐ * CD ☐ *Download from ICC Website

(*Note: A paper copy will not be sent to you if you have chosen the CD or Download format.)

- 2) PLEASE TYPE OR PRINT CLEARLY: FORMS WILL BE RETURNED if they contain unreadable information.

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- 3) *Signature: _____ ☐ Signature on File (see over)

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- 4) Cost Impact: Indicate if this Proposal: ☐ will ☐ will not increase the cost of construction.

- 5) Indicate appropriate International Code(s) associated with this Public Proposal – Please use Acronym:

IBC

If you have also submitted a separate coordination change to another I-Code, please indicate the code: _____
(See back of this form for list of names and acronyms for the International Codes).

- 6) Revision to: ☐ Section _____ ☒ Table 503 ☐ Figure _____

- 7) PROPOSAL Please check appropriate box:

☒ Revise as follows: ☐ Add new text as follows ☐ Delete and substitute as follows: ☐ Delete without Substitution(s):

Show the proposed NEW, REVISED or DELETED TEXT in legislative format: ~~Line through text to be deleted.~~ Underline text to be added.

Revise the number of stories indicated for Type IIB and IIIB construction for the Occupancy Groups below as follows:

Group	Current	Revised
A-1	2	1
A-2	2	1
A-3	2	1
A-4	2	1
B	4	2
E	2	1
F-2	3	2
H-3	2	1
H-4	3	2
I-1	3	1
I-4	2	1
M	4	2
R-1	4	2
R-2	4	2
R-3	4	3

R-4	4	2
S-1	3	2
S-2	4	2

Revise the number of stories indicated for Type VB construction for the Occupancy Groups below as follows:

<u>Group</u>	<u>Current</u>	<u>Revised</u>
H-4	2	1
I-1	2	1

☐ PROPOSAL *Continued* (Attach additional sheets as necessary)

8) SUPPORTING INFORMATION (State purpose and reason, and provide substantiation to support proposed change):

The purpose of this proposed amendment is to reduce the allowable number of stories currently allowed in Table 503 of 2006 International Building Code (IBC) for the use groups indicated so that they are the same as currently allowed by the 2001 California Building Code (CBC) for only the non-rated types of construction, i.e. Types IIB, IIIB, and VB.

We have a significant concern about increasing the allowable number of stories in non-rated types construction which basically do not have any built-in fire-resistive protection for the structural frame, bearing walls where provided, or the floors. Thus, this increases the level of risk to those occupants of the buildings, as well as to the fire fighters who must gain access to the interiors of these buildings that will be allowed to be higher above the ground than currently provided for in the CBC. This becomes not only a life safety issue for the occupants, but also a fire fighter safety and a property protection issue. Obviously, increasing the building height provides more challenges to the fire department to gain access to the upper floors for both rescue and fire fighting purposes. It requires more equipment and more time but the building is not commensurately protected with built-in fire-resistive protection to accommodate those additional access problems and delays that the fire fighters will experience on the scene of an uncontrolled fire. We are especially concerned about those occupancies that are allowed to have a two story additional height advantage over the current CBC which include Groups B, I-1, M, R-1, R-2, R-4, and S-2.

It is also interesting to note that none of the previous legacy model buildings codes including the 1999 BOCA National Building Code (NBC) and the 1999 SBCCI Standard Building Code (SBC) allowed non-sprinklered buildings containing these occupancies to have the same story height limits as the IBC with the exception of the I-1 occupancy in the NBC. All of these occupancies were limited to two stories in non-sprinklered buildings of the non-rated types of construction in the SBC and all except the Group M occupancies were limited to three stories in height in the NBC. The Group M occupancy in the NBC was actually limited to two stories in height as proposed in this amendment. It is also interesting to note that

the SBC does not give a story height increase for an automatic sprinkler system in addition to an area increase for occupancy Groups A, E, H, and I.

In summary, the allowable increases in story heights for the non-rated types of construction should be seriously considered as potentially reducing the overall level of fire and life safety provided for these occupancies in these types of construction as compared to the current CBC. Can these additional story height limits be justified for California? We don't believe so.



SUPPORTING INFORMATION *Continued* (Attach additional sheets as necessary)